

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
DEMOCRATIC NATIONAL COMMITTEE,

Plaintiff,

Civil Action No. 1:18-cv-03501 (JGK)

v.

THE RUSSIAN FEDERATION *et al.*,

Defendants.

----- X

**MOTION TO ADJOURN THE STATUS CONFERENCE AND SUSPEND THE  
DEADLINE FOR RESPONDING TO THE COMPLAINT**

Plaintiff DNC (“Plaintiff”) respectfully requests that the Court adjourn the status conference scheduled for July 5, 2018 until September 5, 2018, or such other time as the Court may prefer, so that more Defendants can attend. Additionally, in the interest of judicial economy, Plaintiff requests that the Court suspend the deadline to respond to the Complaint, at least until the status conference, so that the parties can propose—and the Court can consider—a coordinated schedule for all served Defendants to respond to the Complaint. The represented Defendants who have been served to date—the Trump Campaign, Trump, Jr. and Stone—do not oppose this motion.<sup>1</sup>

Plaintiff filed this case on April 20, 2018 and is working diligently to serve both the domestic and foreign Defendants. On May 2, 2018, Plaintiffs mailed service waivers to the Defendants with addresses in the United States: Aras Iskenerovich Agalarov (“Aras Agalarov”),

---

<sup>1</sup> Plaintiffs attempted to contact Defendant George Papadopoulos multiple times to confirm his *pro se* status and ask whether he opposes this motion, but have been unable to reach him at the phone number or email address listed on his waiver of service form.

Emin Araz Agalarov (“Emin Agalarov”), Donald J. Trump For President, Inc. (“the Trump Campaign”), Donald J. Trump, Jr. (“Trump, Jr.”), Paul J. Manafort, Jr. (“Manafort”), Roger J. Stone, Jr. (“Stone”), Jared C. Kushner (“Kushner”), George Papadopoulos (“Papadopoulos”), Richard W. Gates, III (“Gates”).<sup>2</sup> Only four Defendants (the Trump Campaign, Trump Jr., Stone, and Papadopoulos) returned the waivers by the deadline. Plaintiff has commenced service of the remaining domestic Defendants, but that process is not likely to be completed for at least several weeks.

Plaintiff is also in the process of serving the Russian Defendants—the Russian Federation (“Russia”), the General Staff of the Armed Forces of the Russian Federation (“GRU”), and the GRU operative using the pseudonym “Guccifer 2.0” (“GRU Operative #1”)—pursuant to the Court’s May 24, 2018 Order. That process will also require at least several weeks to be accomplished.<sup>3</sup>

Adjourning the status conference until September 5, 2018 would allow Plaintiff to serve all, or substantially all, of the Defendants, and should give the Defendants an opportunity to retain counsel to represent them at the conference.<sup>4</sup> And suspending the deadline to respond to the Complaint would allow the parties to propose a schedule that will permit the coordination of responses to the Complaint. The coordination of responses to the Complaint and briefing that may accompany them will foster judicial economy because it will permit the Court and the parties to address common features of the parties’ positions together.

---

<sup>2</sup> Although Wikileaks has a post office box in this country, it will not accept service at its domestic address.

<sup>3</sup> Efforts are underway to explore service of Wikileaks, Julian Assange, and Josef Mifsud.

<sup>4</sup> At least one Defendant (Papadopoulos) is currently appearing *pro se*.

Dated: June 12, 2018

Respectfully submitted,

Michael Eisenkraft (#6974)  
Cohen Milstein Sellers & Toll PLLC  
88 Pine St. • 14th Floor  
New York, NY 10005  
(212) 838-7797

/s/ Joseph M. Sellers

Joseph M. Sellers (admitted *Pro Hac Vice*)  
Geoffrey A. Graber (admitted *Pro Hac Vice*)  
Julia A. Horwitz (admitted *Pro Hac Vice*)  
Alison S. Deich (*Pro Hac Vice* pending)  
Cohen Milstein Sellers & Toll PLLC  
1100 New York Ave. NW • Fifth Floor  
Washington, DC 20005  
(202) 408-4600

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 12, 2018, I electronically filed the Motion to Adjourn the Status Conference and Suspend the Deadline for Responding to the Complaint with the Clerk of the Court using ECF, which in turn sent notice to all counsel of record.

Dated: June 12, 2018

/s/ Julia A. Horwitz  
Julia A. Horwitz

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DEMOCRATIC NATIONAL COMMITTEE,	)	
	)	
Plaintiff,	)	Civil Action No. 1:18-cv-03501-JGK
	)	
v.	)	<b>PROPOSED ORDER</b>
	)	
THE RUSSIAN FEDERATION et al.,	)	
	)	
Defendants.	)	
	)	
	)	

Having reviewed Plaintiff's Motion to Adjourn the Status Conference and Suspend the Deadline for Responding to the Complaint, and good cause appearing therefore, the Court hereby ORDERS as follows:

Plaintiff's Motion to Adjourn the Status Conference and Suspend the Deadline for Responding to the Complaint is GRANTED. The status conference currently scheduled for July 5, 2018, is adjourned until September 5, 2018. The deadline to respond to the Complaint is suspended until the status conference, so that the parties can propose, and the Court can consider, a coordinated schedule for all served Defendants to respond to the Complaint.

IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2018

\_\_\_\_\_  
**Judge John G. Koeltl**  
U.S. District Court for the  
Southern District of New York